

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MAINE**

DAVID ALAN COLE and
KIMBERLY COLE

Plaintiffs,

v.

SIG SAUER, INC.

Defendants.

Case No. 1:23-cv-00327-JDL

JOINT MOTION TO EXTEND CASE MANAGEMENT DEADLINES

Plaintiffs, David Alan Cole and Kimberly Cole and Defendant, Sig Sauer, Inc., by and through their undersigned counsel, jointly move to extend the remaining case management deadlines, and in support thereof, states as follows:

This is a product liability matter in which Plaintiff, David Alan Cole, claims he was shot when his holstered duty issued Sig Sauer P320 was discharged after he executed a search warrant. The parties have made progress in discovery, have served several rounds of paper discovery, and have taken Plaintiffs depositions. In September, the Parties were made aware of body camera footage of Plaintiff's incident which necessitated additional depositions. Additionally, counsel for Plaintiffs and Defendant just completed a four-week trial in the matter of *Abrahams v. Sig Sauer*, that concluded on November 20, 2024, which significantly limited the parties capacity to undertake the additional discovery needed.

The parties have conferred and believe that the requested extension is necessary to allow both parties the time to complete fact discovery, exchange expert reports, and take expert depositions.

The Parties jointly request a 90-day extension of the remaining case management deadlines. The parties jointly propose the following amendments to the current deadlines.

Deadline	Current	Proposed
Fact Discovery	December 26, 2024	March 21, 2025
Plaintiff Expert Reports	October 28, 2024	January 24, 2025
Defendant Expert Reports	November 27, 2024	February 21, 2025
Dispositive Motions	January 16, 2025	April 18, 2025

Respectfully submitted,

**SALTZ MONGELUZZI &
BENDESKY P.C.**

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